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Via Hand-Delivery and Electronic Mail

Pamela Monroe, Administrator
New Hampshire Site Evaluation Committee
21 South Fruit Street
Concord, NH 03301

**Re: NH SEC Docket No. 2015 – 05 Merrimack Valley Reliability Project
New England Power Company d/b/a National Grid and Public Service Company of
New Hampshire d/b/a Eversource Energy: Supplement Number 2 to Application**

Dear Ms. Monroe:

Enclosed for filing with the New Hampshire Site Evaluation Committee (the “Committee”) in the above-captioned matter, please find one original un-redacted copy, three redacted paper copies and one redacted electronic copy of Supplement Number 2 that is being jointly submitted by New England Power Company d/b/a National Grid (“NEP”) and Public Service Company of New Hampshire d/b/a Eversource Energy (“PSNH”) (collectively, the “Applicants”) in connection with their Joint Application for a Certificate of Site and Facility to construct a new 345 kV Transmission Line from the Tewksbury 22A Substation in Tewksbury, Massachusetts to the Scobie Pond Substation in Londonderry, New Hampshire (the “Merrimack Valley Reliability Project” or “MVRP”). The New Hampshire portion of MVRP that is the subject of this SEC Docket is herein referred to as the “Project.”

On August 5, 2015, the Applicants submitted their application to the Committee, which was accepted on October 5, 2015. On October 1, 2015, the New Hampshire Department of Environmental Services issued Shoreland Impact Permit Number 2015-02335 for the Project, which the Applicants submitted to the Committee as Supplement Number 1 on October 16, 2015, to be included in the Application as Appendix G-1.

Supplement Number 2 is now being submitted to provide additional updates and minor modifications to the Project, including:

- Structure relocations and structure type changes consisting of six structure relocations to minimize impacts to abutters, one structure relocation to avoid impacts to rare plants, one structure relocation to avoid breaching a stonewall, one structure type change (applicable to two structures) to improve constructability, and one structure type change to meet tension and sag design requirements;

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- Accessway and laydown area modifications to minimize impacts to wetlands and rare plants, and to improve constructability;
- An additional New Hampshire Department of Transportation (“NHDOT”) Driveway Permit for access to a structure relocation;
- Confidential results of rare, threatened and endangered species surveys, agreements from regulatory consultations, and update on the wetlands in-kind mitigation project;
- Confidential results of Phase IB archaeological survey completed on the NEP segment of the Project (Segment 2);
- One alteration to Figure 10 of Appendix AB. *Visual Impact Assessment Merrimack Valley Reliability Project, Towns of Pelham, Windham, Hudson and Londonderry, NH, May 2015*, namely, the visual simulation for the Appleway;
- Revision of two tables in Appendix AG. *Eversource/National Grid Merrimack Valley Reliability Project Electric Field, Magnetic Field, Audible Noise, and Radio Noise Modeling in New Hampshire, June 16, 2015*; and
- Corrections to pages 48 through 51 in the Joint Application that reference incorrect Engineering Drawings.

As discussed herein, the structure modifications will not increase electrical and magnetic fields, or audible noise, nor will they change aesthetic effects. The modifications to structure locations, accessways, and laydown areas will not affect archaeological resources.

The Applicants are simultaneously providing a copy of this letter with a redacted copy of the Supplement in both electronic and paper form to each town (Londonderry, Windham, Hudson, and Pelham) to Ms. Huard and to Counsel for the Committee. The Applicants are also providing a copy of this letter with an unredacted copy of the Supplement to Counsel for the Public.

1. Project Modifications – Structure, Accessway, and Laydown Area Revisions

Since filing the Application, the Applicants have continued to work with property abutters to avoid, minimize, and mitigate visual impacts, while simultaneously refining the Project to reduce potential environmental impacts. The Applicants remain committed to working with abutters along the Project corridor to further avoid and minimize impacts. The Applicants have also identified certain structures, laydown areas, and accessways that will be altered to reduce potential environmental impacts or improve constructability.

As described in more detail in the attached memorandum from VHB, *see* Attachment A, PSNH will relocate six structures and make certain alterations to accessways in three areas in the Town of Londonderry. NEP will also shift the location of four laydown areas, one accessway, and two structures to reduce environmental impacts and aid with the constructability of the Project.

Based on these modifications, the Applicants have updated their Wetland Permit Application, including the estimated square feet of temporary impacts, and the Wetland Permitting Plan Set. To reflect the above-referenced changes, the Applicants have updated the requisite pages of their Application and pre-filed testimony. Revisions to the NHDES jurisdictional wetland impacts are also summarized in Table 8, page 70 of the Joint Application. In addition, the Alteration of Terrain Permitting Plans have been updated to reflect these Project modifications and the new plans should be replaced within Appendix O of the Joint Application.

In addition to updates to the Wetland Permitting Plan Set, the modifications are also displayed on certain sheets of the revised Engineering Drawings, which will be substituted in Appendix R.

Public Archaeology Laboratory (“PAL”), the Project’s cultural resources experts, reviewed the structure, accessway, and laydown area relocations along Segment 2 of the Project and concluded that there would be no impact to archaeological resources. In addition, PAL determined that based upon the prior Phase IA archaeological survey of Segments 3 and 4 for a prior PSNH project—for which the New Hampshire Division of Historical Resources (“NHDHR”) did not recommend further archaeological surveys—there will be no impacts to archaeological resources caused by the Project modifications in Segments 3 and 4. *See* Joint Application, page 13.

According to Exponent, Inc., the Project’s electrical and magnetic field and sound experts, the proposed structure modifications will not change the relative position of the proposed transmission line on the right-of-way (“ROW”). Because the calculations use the minimum elevation assumption within a span, and the line is designed to accommodate National Electrical Safety Code (“NESC”) clearance requirements, the underlying assumptions have not changed for the purposes of field calculations. Therefore, these above-referenced structure modifications will have no effect on calculated electric and magnetic fields, audible noise or radio interference.

2. Modifications to NHDOT Permits

As part of the previously discussed modifications, the Project is relocating Structure number 221 from the south side of Route 102 to the north side of Route 102 in the Town of Londonderry. To accomplish this structure move, the Project is applying for a Driveway Permit from the NHDOT, to be identified as Appendix P-1.

3. Environmental Updates – 2015 Survey Results, 2016 Proposed Survey Protocols, Best Management Practices for Construction and Updates to Wetlands Mitigation

First, Supplement Number 2 contains the results of 2015 rare plant species surveys, proposed 2016 rare species protocols and best management practices for the construction of the Project as developed in coordination with the New Hampshire Natural Heritage Bureau (“NHNHB”). These updates are described in two memoranda¹: (1) *MVRP Rare Plant Surveys—2015 Results – Mitigation Recommendations (Rev. 1)* (confidential); and (2) *MVRP Rare Plant Surveys – 2016 Survey Protocols* (confidential), as agreed upon with NHNHB.

Second, the 2015 rare, threatened and endangered animal species survey, *MVRP – Black Racer Collector Permit, Turtle Survey Results and other Observed Rare Species Observations* (confidential), for the New Hampshire Fish and Game Department (“NHFG”) is also included as part of Supplement Number 2²: The Applicants are currently coordinating with NHFG in finalizing rare, threatened and endangered animal species field protocols and best management practices for the construction of MVRP. Once completed, this memorandum will be forwarded to the Committee.

Third, the Applicants are submitting the *MVRP Northern Long-eared Bat Acoustic Survey Report*³ (confidential). VHB performed an acoustic bat survey during the summer of 2015 to determine the presence or absence of northern long-eared bat. Results of the survey indicate that none of the suspected bat calls detected over the 15.4 kilometers of suitable summer habitat could be positively attributed to northern long-eared bat. The Applicants submitted the Report to the United States Army Corps of Engineers (“USACE”) and the United States Fish and Wildlife Service (“USFWS”) for review. Based on communications with USACE, it is the Applicants’ understanding that USACE will issue a Determination of No Effect and that USFWS will concur.

The Applicants hereby submit one un-redacted copy of the aforementioned materials. The remaining hard copies and electronic copies have been redacted, which can be distributed to members of the Committee and posted to the Committee’s website. The Applicants are also submitting an additional Motion for Protective Order and Confidential Treatment for these specified materials.⁴

Fourth, the Applicants have updated the wetlands mitigation calculations to reflect Project modifications and recent guidance from the US Environmental Protection Agency

¹ Included in Appendix F-1, Revised NHDES Wetland Permit Application, Attachment D.

² Included in Appendix F-1, Revised NHDES Wetland Permit Application, Attachment D.

³ Included in Appendix F-1, Revised NHDES Wetland Permit Application, Attachment D.

⁴ The Applicants original Motion for Protective Order and Confidential Treatment sought confidential treatment for archaeological information and critical energy infrastructure information only.

(“USEPA”) regarding mitigation for secondary impacts to vernal pools and buffers. The updated USACE jurisdictional impacts and mitigation burden are included in Table 9, page 73 of the Joint Application.

Lastly, as described in Attachment A, the VHB memorandum, the Applicants continue to work with the Town of Pelham to develop an in-kind mitigation project, which will be submitted to the Committee before the final hearings.

4. Archaeological Resources Updates – Phase IB Survey

The Applicants submit their completed Phase IB Archeological Survey for Segment 2 of Project and request that the Committee issue a further protective order and grant confidential treatment of these materials, namely, the confidential archaeological resources data that are contained in the survey. *See Applicants’ Unassented-To Motion for Protective Order and Confidential Treatment, Docket 2015-05, ¶ 16, 19 (July 21, 2015).* One un-redacted copy is being submitted as Appendix AN. The remaining hard copies and electronic copies have been redacted, which can be distributed to members of the Committee and posted to the Committee’s website.

The Committee recently granted the Applicants’ initial request on November 19, 2015. *See Order Granting Applicant’s Motion for Protective Order and Confidential Treatment.* The Phase IB Survey includes information that is specifically protected by RSA 227-C:11 and therefore is an exception to New Hampshire’s Right-to-Know Law. As such, the Applicants respectfully request that the Phase I-B survey be protected pursuant to the Committee’s Order of November 19, 2015 (stating that “any future requests for a protective order, which are subsequently granted by the Committee, will be handled with the same procedures”).

The Phase IB archaeological survey was completed by PAL to identify any archaeological resources within the NEP ROW in the Towns of Pelham, Windham, and part of Hudson, designated as Segment 2 of the Project. A total of 286, 50 x 50 centimeter test pits were excavated within the Project area as 47 arrays at pole structures and seven linear transects along accessways. No pre-contact cultural material was recovered and none of the post-contact materials were interpreted as archeological sites.

The Applicants have submitted the Phase IB survey work to the NHDHR. Recently, NHDHR communications indicated concurrence with PAL’s recommendation that no further survey work was recommended. *See NHDHR Project Review letter, Dec. 9, 2015, added as Appendix AN.*

5. Updates to the Visual Impact Assessment

None of the proposed structure revisions alter any of the findings or conclusions made by EDR, the Project’s visual impact assessment expert. The Applicants, however, are submitting a revised Visual Simulation for Figure 10: Viewpoint 65 (Appleway, Elwood Road, Town of

Londonderry) to reflect a structure relocation. The new simulation should be replaced in Appendix AB to the Application.

6. Electric and Magnetic Field (“EMF”), Audible Noise and Radio Interference Updates

As discussed above, the structure relocations and modifications will have no effect on calculated electric and magnetic fields, audible noise, or radio interference.

The Applicants are, however, providing a correction to previously submitted material contained in Appendix AG. The calculated EMF values contained in sections 8(b) and 8(c) in Appendix AG were based upon inaccurate conductor heights for the Y-151 line. To rectify these calculations, the Applicants are including the proper calculations for these sections in Tables A-1 and A-2 in Appendix AG. The ultimate conclusions do not change. The configuration change was insignificant and therefore does not affect the calculated numbers for audible or radio noise (Tables A-3 and A-4 in Appendix AG).

7. Corrections to Engineering Drawing References

The Applicants also submit replacements for pages 48 through 51 in the Joint Application. Footnotes 51, 53, 54, 55, 56, 57, 58, 59, 60 in the Joint Application mistakenly refer to drawings that are labeled S3124-T005, when, in fact, the correct reference should be to S3124-P005.

Please contact me directly if you have any questions.

Very truly yours,



Barry Needleman

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Enclosures

cc:
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